

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:	) Chapter 11
	)
W. R. GRACE & CO., et al., <sup>1</sup>	) Case No. 01-01139 (AMC)
	) (Jointly Administered)
Reorganized Debtors.	)
	) <b>Hearing Date: August 26, 2021, at 10:00 a.m.</b>
	) <b>Objection Deadline: July 27, 2021, at 4:00 p.m.</b>

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**NOTICE OF MOTION FOR AN ORDER: (I) ENFORCING AGAINST RUNE KRAFT  
THE PLAN AND CONFIRMATION CLAIM PRECLUSION BARS TO POST-BAR  
DATE ASSERTION OF ADMINISTRATIVE EXPENSE CLAIMS; AND (II)  
COMPELLING RUNE KRAFT TO DISMISS WITH PREJUDICE HIS COMPLAINT  
AGAINST THE REORGANIZED DEBTOR IN THE MATTER CAPTIONED KRAFT  
V. CHEVRON CORP. ET AL., CASE NO. 2:21-CV-00575-DJH  
(THE “ARIZONA-CHEVRON LITIGATION”)**

TO: (i) the Office of the United States Trustee; (ii) Counsel for the WRG Asbestos PI Trust; (iii) Counsel for the Asbestos PI Future Claimants Representative; (iv) Counsel for the Asbestos PD Future Claimants Representative; (v) Counsel for the WRG Asbestos PD Trust (7A); (vi) Counsel for the WRG Asbestos PD Trust (7B); (vii) Counsel for the CDN ZAI PD Claims Fund; (viii) those parties that requested service and notice of papers in accordance with Fed. R. Bankr. P. 2002; and (ix) Rune Kraft.

On July 13, 2021, the above-captioned reorganized debtor (collectively, the “Reorganized Debtor”) filed the attached *Motion for an Order: (I) Enforcing Against Rune Kraft the Plan and Confirmation Claim Preclusion Bars to Post-Bar Date Assertion of Administrative Expense Claims; and (II) Compelling Rune Kraft to Dismiss With Prejudice His Complaint Against the Reorganized Debtor in the Matter Captioned Kraft V. Chevron Corp. et al., Case No. 2:21-CV-00575-DJH (the “Arizona-Chevron Litigation”)* (the “Motion”) with the United States Bankruptcy Court for the District of Delaware, 824 Market Street, Wilmington, Delaware 19801 (the “Bankruptcy Court”). A true and correct copy of the Motion is attached hereto.

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<sup>1</sup> W. R. Grace & Co. (f/k/a Grace Specialty Chemicals, Inc., or “Grace”) is the sole remaining Reorganized Debtor and Case no. 01-1139 is the sole remaining open chapter 11 case.

Responses to the relief requested in the Motion, if any, must be in writing and be filed with the Bankruptcy Court no later than 4:00 p.m. (prevailing Eastern time) on **July 27, 2021**. At the same time, you must also serve a copy of the objections or responses, if any, upon the following: (i) co-counsel for the Reorganized Debtor, Kirkland & Ellis LLP (Attn: Adam C. Paul, Esq. and John Donley, Esq.) [adam.paul@kirkland.com](mailto:adam.paul@kirkland.com) and [john.donley@kirkland.com](mailto:john.donley@kirkland.com) and The Law Offices of Roger Higgins, LLC (Attn: Roger J. Higgins, Esq.) [rhiggins@rogerhigginslaw.com](mailto:rhiggins@rogerhigginslaw.com), and Pachulski Stang Ziehl & Jones LLP, (Attn: Laura Davis Jones, Esq. and James E. O'Neill, Esq.) [ljones@pszjlaw.com](mailto:ljones@pszjlaw.com) and [jo'neill@pszjlaw.com](mailto:jo'neill@pszjlaw.com); (ii) the Office of the United States Trustee, (Attn: Richard L. Schepacarter, Esq.) [richard.schepacarter@usdoj.gov](mailto:richard.schepacarter@usdoj.gov); (iii) counsel for the WRG Asbestos PI Trust; Campbell & Levine, LLC, (Attn: Marla Rosoff Eskin, Esq., Mark T. Hurford, Esq. and Philip E. Milch, Esq.) [meskin@camlev.com](mailto:meskin@camlev.com), [mhurford@camlev.com](mailto:mhurford@camlev.com), [pmilch@camlev.com](mailto:pmilch@camlev.com); (iv) counsel for the Asbestos PI Future Claimants Representative, Phillips, Goldman, McLaughlin & Hall, P.A., (Attn: John C. Phillips, Jr., Esq.) [jcp@pgmhllaw.com](mailto:jcp@pgmhllaw.com); (v) counsel for the Asbestos PD Future Claimants Representative, Seitz, Van Ogtrop & Green, P.A., (Attn: R. Karl Hill, Esq.) [khill@svglaw.com](mailto:khill@svglaw.com), and Alan B. Rich Law Office (Attn: Alan B. Rich, Esq.) [alan@alanrichlaw.com](mailto:alan@alanrichlaw.com); (vi) counsel for the WRG Asbestos PD Trust (7A), WRG Asbestos PD Trust, (Attn: Richard B. Schiro, Esq.) [rbschiro@schirrolaw.com](mailto:rbschiro@schirrolaw.com) and Dykema Cox Smith, (Attn: Deborah D. Williamson, Esq.) [dwilliamson@dykema.com](mailto:dwilliamson@dykema.com); and (vii) counsel for the WRG Asbestos PD Trust (7B), Sullivan Hazeltine Allinson LLC, (Attn: William D. Sullivan, Esq.) [wsullivan@sha-llc.com](mailto:wsullivan@sha-llc.com) and Barnwell Whaley Patterson & Helms LLC, (Attn: M. Dawes Cooke, Esq.) [mdc@barnwell-whaley.com](mailto:mdc@barnwell-whaley.com).

IF NO OBJECTIONS ARE TIMELY FILED AND SERVED IN ACCORDANCE WITH THIS NOTICE, THE BANKRUPTCY COURT MAY GRANT THE RELIEF REQUESTED BY THE MOTION WITHOUT FURTHER NOTICE OR HEARING.

IN THE EVENT THAT ANY OBJECTION OR RESPONSE IS FILED AND SERVED IN ACCORDANCE WITH THIS NOTICE, A HEARING ON THE OBJECTION WILL BE HELD BEFORE THE HONORABLE ASHELY M. CHAN AT THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA, ROBERT N.C. NIX FEDERAL COURTHOUSE, 900 MARKET STREET, SECOND FLOOR, COURTROOM 4, PHILADELPHIA, PA 19017, ON **AUGUST 26, 2021, AT 10:00 A.M. PREVAILING EASTERN TIME.**

Dated: July 13, 2021

THE LAW OFFICES OF ROGER HIGGINS, LLC  
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and

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/s/ James E. O'Neill

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